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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

LEE KIRK, An Individual) CASE NO. **2:18-cv-00043**

Plaintiff,

vs.

TRULITE GLASS AND ALUMINUM
SOLUTIONS, LLC, a Foreign Limited
Liability Company, HERBERT CORTEZ,
an Individual, STEVE WILLIAMS,
an Individual, SHAUN HANNA, an
Individual, DOES I -X;
ROE CORPORATIONS I -X.

Defendants.

**STIPULATION AND ORDER TO EXTEND THE TIME FOR PLAINTIFF TO
RESPOND TO DEFENDANTS' MOTION TO DISMISS AND FOR DEFENDANTS
TO FILE THEIR REPLY IN SUPPORT OF THAT MOTION TO DISMISS
(SECOND REQUEST)**

COMES NOW, the Plaintiff, LEE KIRK ("Kirk"), by and through his attorney,
JENNY L. FOLEY, Ph.D., ESQ., of the law firm HKM EMPLOYMENT ATTORNEYS
LLP, and Defendants, TRULITE GLASS AND ALUMINUM SOLUTIONS, LLC,
HERBERT CORTEZ, STEVE WILLIAMS, and SHAUN HANNA, ("DEFENDANTS"), by
and through their attorney, TIMOTHY ROEHRS, ESQ., of LITTLER MENDELSON, P.C.
and hereby stipulate and agree as follows:

1 1. That the Opposition to the Defendants' Motion to Dismiss that was due on
2 March 28th, 2018, will now be due on April 11th, 2018.

3 2. That the Reply to the Opposition to the Defendants' Motion to Dismiss will
4 then be due on April 25th, 2018.

5 3. This request for an extension of time is made in good faith and not for purpose
6 of delay and is being made because the parties are presently working on a stipulation that they
7 believe will result in the withdrawal of Defendants' Motion to Dismiss and the filing of an
8 Amended Complaint.

9 4. This is the second request for an extension of time with respect to the
10 Opposition and Reply briefs associated with Defendants' Motion to Dismiss.

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14 Dated this 30th day of March, 2018.

Dated this 30th day of March, 2018.

15 **HKM Employment Attorneys LLP**

Littler Mendelson P.C.

16
17 /s/ Jenny L. Foley
18 Jenny L. Foley, Ph.D., Esq.
19 Nevada Bar No. 9017
1785 East Sahara Ave., Suite 325
20 Las Vegas, Nevada 89104

/s/ Timothy Roehrs
Timothy Roehrs, Esq.
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3960 Howard Hughes Parkway,
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IT IS SO ORDERED that the Opposition to the Defendants' Motion to Dismiss shall be due on April 11th, 2018;

Dated: April 2, 2018.

Respectfully submitted by:
HKM Employment Attorneys LLP

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